

Exhibit H

(Second Requests for Admission)

H-1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No.

1:19-cv-1301-WMR

**PLAINTIFF’S SECOND SET OF REQUESTS FOR ADMISSION TO
DEFENDANT LATASHA TRANSRINA KEBE**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, and the Definitions and Instructions that follow, BELCALIS MARLENIS ALMÁNZAR (“Plaintiff”), by her attorneys Moore Pequignot LLC and Adelman Matz P.C., hereby requests that Defendant LATASHA TRANSRINA KEBE (“Kebe”) answer the following requests for admission (the “Requests”) separately and fully within the period specified by Rule 36.

DEFINITIONS AND INSTRUCTIONS

1. Plaintiff incorporates by reference the definitions set forth in Plaintiff’s First Set of Interrogatories to Defendant Latasha Kebe served on October 4, 2019.

2. Each matter is admitted unless, within thirty (30) days after service of these Requests, Defendants serve a written answer or objection addressed to the matter and signed by Defendants or their attorney.

3. If objection is made, the reasons therefor shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why Defendants cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that Kebe qualify an answer or deny only a part of the matter of which an admission is requested, it shall specify so much of it as is true and qualify or deny the remainder.

4. Kebe may not give lack of information or knowledge as a reason for failure to admit or deny unless she states that she has made reasonable inquiry and that information known or readily obtainable by her is insufficient to enable it to admit or deny.

5. If Kebe does not admit an item, she shall:

- (a) Produce to Plaintiff all documents concerning the requested admission in their possession, custody or control;
- (b) State, with particularity, the factual basis upon which Defendants' response is based; and
- (c) Identify each and every person with knowledge of the requested

admission.

6. These requests for admissions are continuing. Kebe shall promptly supply by way of supplemental responses any and all additional information that may become known prior to any hearing in or trial of this action.

7. Each of the foregoing definitions and instructions is hereby incorporated by reference into, and shall be deemed a part of, each and every other definition and instruction contained herein as well as each specific Request set forth below.

REQUESTS

119. Admit the video identified as CARDI VIDEO 128 is a true, accurate and authentic copy of the video you published on or around October 1, 2020 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

120. Admit the video identified as CARDI VIDEO 129 is a true, accurate and authentic copy of the video you published on or around December 20, 2019 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

121. Admit the video identified as CARDI VIDEO 130 is a true, accurate and authentic copy of the video you published on or around April 24, 2020 on

YouTube under the account Wino Gang Podcast which depicts your voice and person.

122. Admit the video identified as CARDI VIDEO 131 is a true, accurate and authentic copy of the video you published on or around October 7, 2019 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

123. Admit the video identified as CARDI VIDEO 132 is a true, accurate and authentic copy of the video you published on or around April 24, 2020 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

124. Admit the video identified as CARDI VIDEO 133 is a true, accurate and authentic copy of the video you published on or around April 23, 2019 on YouTube under the account Wino Gang Podcast.

125. Admit the video identified as CARDI VIDEO 134 is a true, accurate and authentic copy of the video you published on or around September 30, 2018 on YouTube under the account Wino Gang Podcast.

126. Admit the video identified as CARDI VIDEO 139 is a true, accurate and authentic recording of the video you published on or around September 4,

2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

127. Admit the video identified as CARDI VIDEO 140 is a true, accurate and authentic recording of the video you published on or around July 15, 2017 on YouTube under the account unWinewithTashaK which depicts your voice and person.

128. Admit the video identified as CARDI VIDEO 141 is a true, accurate and authentic recording of the video you published on or around August 17, 2017 on YouTube under the account unWinewithTashaK which depicts your voice and person.

129. Admit the video identified as CARDI VIDEO 143 is a true, accurate and authentic recording of the video you published on or around October 1, 2020 on YouTube under the account Wing Gang Podcast which depicts your voice and person.

130. Admit the video identified as CARDI VIDEO 144 is a true, accurate and authentic copy of the video you published on or around October 18, 2020 on YouTube under the account Wino Gang Podcast which depicts your voice and person.

131. Admit the video identified as CARDI VIDEO 145 is a true, accurate and authentic recording of the video you published on or around October 4, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

132. Admit the video identified as CARDI VIDEO 146 is a true, accurate and authentic recording of the video you published on or around October 28, 2020 on YouTube under the account unWinewithTashaK which depicts your voice and person.

Dated: October 30, 2020

Respectfully submitted,

/s/Sarah M. Matz

Sarah M. Matz

(admitted pro hac vice)

Gary Adelman

(admitted pro hac vice)

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Attorneys for Plaintiff

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NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1:19-cv-01301-WMR

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2020, I emailed PLAINTIFF'S
SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT
LATASHA TRANSRINA KEBE to Defendant's attorneys of record (pursuant to
an agreement by the parties) at the following addresses:

Olga Izmaylova (olga@silawatl.com)
Sadeer Sabbak (ssabbak@silawatl.com)

W. Andrew Pequignot

H-2

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**DEFENDANT KEBE’S RESPONSES TO PLAINTIFF’S SECOND SET OF
REQUESTS FOR ADMISSION**

COMES NOW, LATASHA KEBE, the Defendant in the above-styled civil action, and submits the following responses to Plaintiff’s Second Set of Requests for Admission to Defendant Latasha Transrina Kebe:

Response to Request for Admission No. 119

Ms. Kebe admits that CARDI VIDEO 128 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 1, 2020, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 120

Ms. Kebe admits that CARDI VIDEO 129 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on December 20, 2019, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 121

Ms. Kebe admits that CARDI VIDEO 130 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 24, 2020, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 122

Ms. Kebe admits that CARDI VIDEO 131 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she published on October 7, 2019, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 123

Ms. Kebe admits that CARDI VIDEO 132 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on April 24, 2020, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 124

Ms. Kebe admits that CARDI VIDEO 133 is a true, accurate, and authentic copy of the video that she published on April 23, 2019, on Facebook under the account Tasha K.

Response to Request for Admission No. 125

Ms. Kebe admits that CARDI VIDEO 134 is a true, accurate, and authentic copy of the video that she published on September 29, 2018, on Facebook under the account Tasha K.

Response to Request for Admission No. 126

Ms. Kebe admits that CARDI VIDEO 139 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on September 4, 2020, on YouTube under the account unWinewithTashaK.

Response to Request for Admission No. 127

Ms. Kebe admits.

Response to Request for Admission No. 128

Ms. Kebe admits.

Response to Request for Admission No. 129

Ms. Kebe admits that CARDI VIDEO 143 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 2, 2020, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 130

Ms. Kebe admits that CARDI VIDEO 144 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 3, 2020, on YouTube under the account Wino Gang Podcast.

Response to Request for Admission No. 131

Ms. Kebe admits.

Response to Request for Admission No. 132

Ms. Kebe admits that CARDI VIDEO 146 is a true, accurate, and authentic copy of the video, which depicts her voice and person, that she streamed live on October 29, 2020, on YouTube under the account unWinewithTashaK.

Respectfully submitted this 29th day of November, 2020.

/s/Olga Izmaylova
olga@silawatl.com
Georgia State Bar No. 666858

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